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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEWREZ LLC f/k/a NEW PENN FINANCIAL  
d/b/a SHELLPOINT MORTGAGE  
SERVICING,

Counter-claimant,

v.

TEAL PETALS ST TRUST; DOES I through  
X, inclusive; and ROE CORPORATIONS  
I through X, inclusive,

Counter-defendants.

NEWREZ LLC f/k/a NEW PENN FINANCIAL  
d/b/a SHELLPOINT MORTGAGE  
SERVICING,

Plaintiff,

v.

IYAD HADDAD aka EDDIE HADDAD;  
RESOURCES GROUP, LLC; RESOURCES  
GROUP, LLC as Trustee of TEAL PETALS ST  
TRUST; 9863 DUBLIN VALLEY, LLC;  
SATICOY BAY LLC dba SATICOY BAY  
LLC SERIES 9863 DUBLIN VALLEY ST;  
SATICOY BAY LLC SERIES 9863 DUBLIN  
VALLEY ST; DOES I through X, inclusive; and  
ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No.: 2:22-cv-00395-JAD-DJA  
Consolidated with  
Case No.: 2:23-cv-01839-JAD-MDC

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES**

**(NINTH REQUEST)**

**As amended on pages 7 and 8**

NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing (**Shellpoint**) and Teal Petals St Trust; Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC; Iyad Haddad aka Eddie Haddad; Saticoy Bay LLC d/b/a Saticoy Bay LLC Series 9863 Dublin Valley St; and Saticoy Bay LLC Series 9863 Dublin Valley St (collectively, **Defending Parties** and together with Shellpoint, the **Parties**) file this stipulation to request the Court to extend the close of discovery and related deadlines by ninety (90) days from the date the Court issues its ruling on Shellpoint's pending Motion for Rule 37(b)(2) sanctions against Defending Parties (the **Motion**). *See* ECF No. 144. This is the Parties' ninth request to extend the discovery deadline in the lead case and fourth request in the consolidated case.

**I. INTRODUCTION.**

The Court consolidated two related cases pending in this District: Case No. 2:22-cv-00395 (**2022 Action**) and Case No. 2:23-cv-01839 (**2023 Action**). ECF No. 69. The Court is familiar with the facts and procedural history in these matters, as set forth in its order granting Shellpoint's motion for judgment on the pleadings and Shellpoint's quiet-title counterclaim in the 2022 Action, ECF No. 62, and the order it issued in the 2023 Action on the defendants' motions to dismiss, ECF No. 45 in the 2023 Action. The procedural history, including the claims and counterclaims Shellpoint asserts against the Defending Parties on which discovery shall proceed, is set forth in the Parties' stipulations to consolidate filed in both actions. ECF No. 68; ECF No. 54 in the 2023 Action.

**II. STATEMENT SPECIFYING THE DISCOVERY COMPLETED.**

The Parties served initial disclosures in both of the now-consolidated actions and have engaged in written discovery since 2023. Both sides have produced documents; however, as set forth in the Motion, Shellpoint asserts that the Defending Parties' productions and certain other discovery responses are severely insufficient. The Defendants, on the other hand, assert that the discovery sought is needless to adjudicate Shellpoint's remaining claims of Unjust Enrichment and Abuse of Process, particularly in light of the Defendants the Order approving the Defendants' stipulation to be held jointly and severally liable for any damages that might be awarded to Shellpoint herein. In addition,

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1 Shellpoint has served subpoenas on various third-parties seeking the production of documents. No  
 2 depositions have occurred, and no expert disclosures have been made. Discovery is currently set to  
 3 close on **August 19, 2025**. ECF No. 142.

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 9 particularly in light of the Defendants the Order approving the Defendants' stipulation to be held  
 10 jointly and severally liable for any damages that might be awarded to Shellpoint herein. In addition,  
 11 Shellpoint has served subpoenas on various third-parties seeking the production of documents. No  
 12 depositions have occurred, and no expert disclosures have been made. Discovery is currently set to  
 13 close on **August 19, 2025**. ECF No. 142.

14 **A. 2022 ACTION**

15 To date, the Parties have undertaken the following discovery in the 2022 Action:

- 16 1) Shellpoint served its initial disclosures on April 7, 2022.
- 17 2) Teal Petals served its initial disclosures on August 9, 2023.
- 18 3) Teal Petals served its first set of interrogatories and first set of requests for production  
 19 of documents on Shellpoint on October 17, 2023.
- 20 4) Shellpoint served a first supplement to its initial disclosures on October 25, 2023.
- 21 5) Shellpoint served its first set of interrogatories, first set of requests for admission, and  
 22 first set of requests for production of documents on Teal Petals on October 25, 2023.
- 23 6) Shellpoint served a subpoena duces tecum for real property tax records on the custodian  
 24 of records for the Clark County Treasurer on October 26, 2023.
- 25 7) Shellpoint served a second supplement to its initial disclosures on November 3, 2023.
- 26 8) Shellpoint served a notice of deposition on November 3, 2023, setting Teal Petals' Rule  
 27 30(b)(6) deposition for November 29, 2023.

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9) Shellpoint received documents from the Clark County Treasurer in response to its subpoena duces tecum on November 6, 2023.

10) Shellpoint served a third supplement to its initial disclosures on November 29, 2023.

11) Shellpoint served its answers to Teal Petals' first set of interrogatories and first set of requests for production of documents on November 29, 2023.

12) Teal Petals' served its responses to Shellpoint's first set of interrogatories, first set of requests for admission, and first set of requests for production of documents on November 29, 2023.

13) Shellpoint served its verified answers to Teal Petals' first set of interrogatories on December 11, 2023.

14) Shellpoint served a first amended notice of deposition on December 29, 2023, setting Teal Petals' Rule 30(b)(6) deposition for January 17, 2024, to continue as necessary the next day.

15) Shellpoint served a second amended notice of deposition on January 16, 2024, setting Teal Petals' Rule 30(b)(6) deposition for February 12, 2024.

16) Shellpoint served a third amended notice of deposition on February 9, 2024, setting Teal Petals' Rule 30(b)(6) deposition for March 26, 2024.

17) Shellpoint vacated the Rule 30(b)(6) deposition of Teal Petals on March 25, 2024.

18) Teal Petals served a first supplement to its initial disclosures on May 6, 2024.

#### **B. 2023 ACTION**

Prior to consolidation, the Parties undertook the following discovery in the 2023 Action:

1) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC served their initial disclosures on March 1, 2024.

2) Shellpoint served its initial disclosures on March 6, 2024.

3) Shellpoint served a first supplement to its initial disclosures on April 12, 2024.

4) Saticoy Bay LLC; Saticoy Bay LLC Series 9863 Dublin Valley St; and Iyad Haddad<sup>1</sup> served their initial disclosures on April 25, 2024.

<sup>1</sup> Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC; Saticoy Bay LLC; Saticoy Bay LLC Series 9863 Dublin Valley St; and Iyad Haddad are all defendants in the 2023 Action. They are referred to here, collectively, as "**Defendants**," rather than "Defending Parties," which includes Teal Petals St Trust, a plaintiff and counterdefendant in the 2022 Action.

5) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC served their first supplemental disclosures on May 6, 2024.

6) Shellpoint served its first set of written discovery to Defendants in July 2024. Specifically, Shellpoint served its first set of requests for production of documents on July 5, 2024; its first set of interrogatories on July 22, 2024; and its first set of requests for admission on July 25, 2024.

7) Shellpoint served a second supplement to its initial disclosures on July 31, 2024.

8) Shellpoint served a subpoena duces tecum to Kristi Hewes on August 5, 2024.

9) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC served their responses to Shellpoint's first set of requests for production of documents on August 5, 2024.

10) Kristi Hewes responded to Shellpoint's subpoena duces tecum on August 22, 2024.

11) Saticoy Bay LLC Series 9863 Dublin Valley St; Saticoy Bay LLC dba Saticoy Bay LLC Series 9863 Dublin Valley St; and Iyad Haddad served their responses to Shellpoint's first set of requests for production of documents on August 23, 2024.

12) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC; Saticoy Bay LLC Series 9863 Dublin Valley St; Iyad Haddad; and Saticoy Bay LLC dba Saticoy Bay LLC Series 9863 Dublin Valley St served their responses to Shellpoint's first set of requests for admissions on September 3, 2024.

13) 9863 Dublin Valley, LLC served their first set of requests for production of documents and interrogatories on September 28, 2024.

14) Iyad Haddad served his request for production of documents to Shellpoint on October 30, 2024.

15) Shellpoint served its responses to Iyad Haddad's requests for production of documents on December 2, 2024.

16) Shellpoint served a third supplement to its initial disclosures on December 2, 2024.

17) Shellpoint served a fourth supplement to its initial disclosures on December 4, 2024.

18) Shellpoint served its responses to 9863 Dublin Valley, LLC's interrogatories on December 5, 2024.

19) Shellpoint served its responses to 9863 Dublin Valley, LLC's requests for production of documents on December 11, 2024.

20) 9863 Dublin Valley, LLC served its amended responses to Shellpoint's first set of requests for admissions on December 17, 2024.

21) Resources Group, LLC served its amended responses to Shellpoint's requests for admissions on December 17, 2024.

22) 9863 Dublin Valley, LLC served its amended responses to Shellpoint's first set of requests for production of documents and amended responses to Shellpoint's first set of interrogatories on December 20, 2024.

23) Resources Group, LLC as Trustee of Teal Petals St Trust served its responses to Shellpoint's first set of interrogatories and amended responses to Shellpoint's first set of requests for production of documents on December 20, 2024.

24) Resources Group, LLC served its responses to Shellpoint's first set of interrogatories and amended responses to Shellpoint's requests for production of documents on December 20, 2024.

25) Iyad Haddad served his responses to Shellpoint's first set of requests for admissions and interrogatories on December 23, 2024.

26) Iyad Haddad served his amended responses to Shellpoint's first set of requests for production of documents on January 27, 2025.

**III. SPECIFIC DESCRIPTION OF THE DISCOVERY THAT HAS NOT BEEN COMPLETED.**

1) Shellpoint maintains that Defendants have not provided complete responses to Shellpoint's first set of requests for production of documents, first set of requests for admission, and first set of interrogatories. *See* ECF No. 144. Defendants have responded that the discovery is unnecessary to adjudicate Shellpoint's remaining claims and that it is intended only to harass the Defendants.

2) Depositions of the Plaintiff and Defending Parties, including pursuant to Rule 30(b)(6).

3) Further discovery on issues that arise in the course of discovery.

4) Expert disclosures and depositions.

5) Third-party discovery.

6) Other discovery that may be determined to be necessary and appropriate

**IV. REASON WHY EXTENSION IS REQUIRED / GOOD CAUSE.**

On March 10, 2025, Shellpoint filed its Motion for Rule 37(b)(2) sanctions against Defending Parties. *See* ECF No. 144. The Motion outlines a dispute over whether Defending Parties' supplemental responses to Shellpoint's requests for written discovery comply with the Court's prior discovery order (ECF No. 125). The Court's decision on the Motion is likely to impact the course and scope of discovery, including but not limited to further discovery based on the Court's ruling, expert disclosures, depositions, and third-party discovery.

The Motion was fully briefed as of May 5, 2025, and the Parties are currently awaiting a decision from the Court. Accordingly, to allow time for the Parties to obtain a ruling from the Court and complete any outstanding discovery consistent with the Court's decision, the Parties respectfully submit good cause exists to extend the close of discovery by ninety (90) days from the date the Court issues its ruling on the Motion, with corresponding extensions to all related scheduling order deadlines.

Because the new scheduling order deadlines will be contingent on the date the Court resolves the Motion, the Parties will submit a joint status report setting forth the new deadlines for expert and rebuttal disclosures, close of discovery, dispositive motions, and the joint pretrial order within fourteen (14) days of the Court issuing its decision on the Motion. Each side reserves all rights and objections with respect to remaining and additional discovery.

**V. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY.**

The Parties agree that the current discovery deadlines should be extended by ninety (90) days from the date **of this order with remaining deadlines to flow from the discovery cutoff.**

- (a) Discovery Cut Off: ~~TBD (90 days after ruling on the Motion)~~ **9/15/25**
- (b) Motions to amend pleadings or add parties: **None requested.**
- (c) Initial Expert Disclosures: ~~TBD (60 days before discovery cutoff)~~ **7/17/25**
- (d) Rebuttal Expert Disclosures: ~~TBD (30 days before discovery cutoff)~~ **8/16/25**

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(e) Dispositive motions: **TBD** (~~30 days after discovery cutoff~~) 10/15/25

(f) Pre-Trial Order: **TBD** (~~30 days after dispositive motions~~) 11/14/25

DATED this 13<sup>th</sup> day of June, 2025.

<p><b>AKERMAN LLP</b></p> <p><u>/s/ Nicholas E. Belay</u>          ARIEL STERN, ESQ.          Nevada Bar No. 8276          SCOTT R. LACHMAN, ESQ.          Nevada Bar No. 12016          NICHOLAS E. BELAY, ESQ.          Nevada Bar No. 15175          1180 North Town Center Drive, Suite 290          Las Vegas, NV 89144</p> <p><i>Attorneys for NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing</i></p>	<p><b>LAW OFFICES OF ROGER P. CROTEAU</b></p> <p><u>/s/ Timothy E. Rhoda</u>          ROGER P. CROTEAU, ESQ.          Nevada Bar No. 4958          TIMOTHY E RHODA, ESQ.          Nevada Bar No. 7878          2810 W. Charleston Boulevard, Suite 67          Las Vegas, NV 89102</p> <p><i>Attorneys for Teal Petals St Trust; Resources Group, LLC; Resources Group, LLC in its capacity as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC</i></p>
<p><b>CLINE LEGAL SOLUTIONS LLC</b></p> <p><u>/s/ Diana S. Cline</u>          DIANA S. CLINE, ESQ.          Nevada Bar No. 10580          7625 Dean Martin Dr., Suite 115          Las Vegas, NV 89139</p> <p><i>Attorneys for Saticoy Bay LLC; Saticoy Bay LLC 9863 Dublin Valley St. and Iyad Haddad</i></p>	

**IT IS THEREFORE ORDERED** that the parties' stipulation (ECF No. 166) is **granted in part and denied in part**. It is granted in part regarding the parties' request for an extension. However, it is denied in part because the Court declines to set contingent deadlines. Instead, the Court will set concrete deadlines as outlined herein that the parties may stipulate to extend if necessary.

DATED: 6/16/2025

  
**UNITED STATES MAGISTRATE JUDGE**

Case No.: 2:22-cv-00395-JAD-DJA

Consolidated with

Case No.: 2:23-cv-01839-JAD-MDC